

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**SHEILA GRADY,**

*Plaintiff,*

**v.**

**DEAF ACTION CENTER.**

*Defendant.*

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**CIVIL ACTION NO. 3:24-cv-1207**

**DEFENDANT'S WITNESS LIST**

Pursuant to the Court's August 9, 2024's Scheduling Order, Defendant Deaf Action Center ("Defendant" or "DAC") submits its Witness List for trial as follows:

**I. Potential Witnesses**

Defendant anticipates calling the following individuals as fact and expert witnesses:

Heather Hughes  
Executive Director  
3110 Cedarplaza Lane  
Dallas, Texas 75235  
Phone: 214.521.0407

Ms. Hughes will testify regarding issues previously set forth in her declaration in support of Defendant's summary judgment motion, including but not limited to Plaintiff's employment and role at DAC; Plaintiff's job duties and job performance, employment history, and reasons for termination from DAC; DAC's financial resources and priorities; the Specialist Contract and other funding requirements; DAC's business operations; DAC's defenses to Plaintiff's claims, and DAC's policies and procedures. Direct examination for Ms. Hughes is expected to last 5 hours.

Salerno R. Martinez  
Program Manager  
3110 Cedarplaza Lane  
Dallas, Texas 75235  
Phone: 214.521.0407

Ms. Martinez will testify regarding her own employment history and various roles held at DAC; Plaintiff's employment and role at DAC; Plaintiff's job duties and job performance and employment history; her own interactions with Plaintiff and other Access Specialists; the Specialist Contract; DAC's defenses to Plaintiff's claims; and DAC's policies and procedures. Direct examination for Ms. Martinez is expected to last 5 hours.

Paul Hagerty  
HR Consultant  
3110 Cedarplaza Lane  
Dallas, Texas 75235  
Phone: 214.521.0407

If necessary, Mr. Hagerty may testify regarding Plaintiff's employment, performance issues, discipline issued to Plaintiff, his investigation concerning a complaint regarding Plaintiff, and DAC's policies and procedures. Direct examination for Mr. Hagerty is expected to last 1 hour.

Shawn Frazier  
Accounting Manager  
3110 Cedarplaza Lane  
Dallas, Texas 75235  
Phone: 214.521.0407

If necessary, Mr. Frazier may testify regarding Plaintiff's employment, Plaintiff's conduct in the workplace, and his interactions and communications with Plaintiff regarding her employment. Direct examination for Mr. Frazier is expected to last 2 hours.

Roy Jones  
Senior Citizen Program Coordinator  
3110 Cedarplaza Lane  
Dallas, Texas 75235  
Phone: 214.521.0407

If necessary, Mr. Jones may testify regarding Plaintiff's employment, Plaintiff's conduct in the workplace, and his interactions and communications with Plaintiff regarding her employment. Direct examination for Mr. Jones is expected to last 2 hours.

Eric Patterson  
Director of Interpreting  
3110 Cedarplaza Lane  
Dallas, Texas 75235  
Phone: 214.521.0407

If necessary, Mr. Patterson may testify regarding Plaintiff's employment, Plaintiff's conduct in the workplace, and his interactions and communications with Plaintiff regarding her employment. Direct examination for Mr. Patterson is expected to last 2 hours.

Jordan Castilla  
Former Employee  
11012 Creekmere Dr  
Dallas, TX 75218  
832.423.8337

If necessary, Ms. Castilla may testify regarding Plaintiff's employment, Plaintiff's conduct in the workplace, and her interactions and communications with Plaintiff regarding her employment. Direct examination for Ms. Castilla is expected to last 2 hours.

Leona Michael-Makelfa  
Former Employee  
10013 Hope Dr Apt 15304  
Rowlett, TX 75089  
214.405.4775

If necessary, Ms. Michael-Makelfa may testify regarding Plaintiff's employment, Plaintiff's conduct in the workplace, and her interactions and communications with Plaintiff regarding her employment. Direct examination for Ms. Michael-Makelfa is expected to last 2 hours.

Ruth Kirkos  
Former Employee  
12821 Sweet Bay Dr  
Euless, TX 76040  
817.870.6365

If necessary, Ms. Kirkos may testify regarding Plaintiff's employment, Plaintiff's conduct in the workplace, and her interactions and communications with Plaintiff regarding her employment. Direct examination for Ms. Kirkos is expected to last 2 hours.

Kristin Bauer  
Jackson Lewis P.C.  
500 N. Akard, Suite 2500  
Dallas, Texas 75201  
214.520.2400

Ms. Bauer is the attorney of record for Defendant. She will provide expert testimony as to the reasonableness and necessity of attorneys' fees sought by Defendant in this litigation. To the extent that Plaintiff seeks any attorneys' fees in this matter, Ms. Bauer may also provide expert testimony regarding the reasonableness and necessity of any such fees.

Defendant reserves the right to call any additional rebuttal witnesses, as necessary.

Defendant further reserves the right to make objections to any witness designated by Plaintiff.

The adoption by Defendant of any witness list shall not be deemed a waiver of the right to object to the testimony of any witness.

By: /s/ Kristin L. Bauer  
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**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing pleading was electronically filed with the clerk for the U.S. District Court, Northern District of Texas on July 3, 2025, using the electronic case filing system of the court, and the electronic case filing system sent a “Notice of Electronic Filing” to the following attorneys of record:

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/s/ Kristin L. Bauer  
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